



# Modern Slavery Statement

**Last Updated: August 21, 2024**



# Introduction

This Modern Slavery Act Transparency Statement (the “Statement”) is made on behalf of Sprinklr, Inc. and its subsidiaries and affiliates (“Sprinklr”). We are publishing this Statement in accordance with the United Kingdom Modern Slavery Act of 2015 and all other applicable laws and regulations (collectively, “Modern Slavery Laws”) as a demonstration of our commitment to anti-slavery practices and an affirmation of the values we hold and adopt across our business.

Sprinklr is dedicated to ethical and responsible business operations and strives to ensure that the way we conduct business reflects our values and belief that everyone should be treated with dignity and mutual respect in an environment free from harassment and discrimination. We are committed to practices that combat modern slavery and human trafficking, and to working with and encouraging any suppliers to uphold the principles in this statement, as well as [Sprinklr’s Supplier Code of Conduct](#).

This Statement is given for the financial year ending 31 January 2025 and sets out the steps taken during the financial year to prevent modern slavery and human trafficking in Sprinklr’s business and supply chains.

Modern Slavery is a term used to encapsulate offences in the Modern Slavery Act 2015: slavery, servitude and forced or compulsory labor; and human trafficking. These three terms are defined below:

- a) “Slavery” and “Servitude” mean where people are dehumanized, treated as a commodity, bought or sold as “property”, have restrictions placed on their freedom or are generally exploited for someone else’s gain. Slavery often involves Forced or Compulsory Labor.
  
- b) “Forced or Compulsory Labor” means where someone is forced to work, or is otherwise controlled by an “employer”, through coercion, mental or physical abuse, or the threat of abuse.
  
- c) “Human trafficking” relates to arranging or facilitating the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel.

## Sprinklr's Modern Slavery Policy Statement

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, all of which have in common the deprivation of a person’s liberty by another to exploit them for personal or commercial gain.

Sprinklr has a zero-tolerance approach to modern slavery. Sprinklr is committed to acting ethically and with integrity in all its business dealings and relationships, and to implementing



and enforcing effective systems and controls, to help ensure that modern slavery is not taking place anywhere in our business or in any of our supply chains.

Sprinklr is also committed to ensuring there is transparency in our business and in our approach to tackling modern slavery throughout its supply chains, consistent with our disclosure obligations under Modern Slavery Laws. We expect the same high standards from all of our contractors, suppliers and other business partners. As part of Sprinklr's contracting processes, Sprinklr includes specific prohibitions against the use of forced, compulsory or trafficked labor, or anyone held in slavery or servitude, whether adults or children, and Sprinklr expects and requires that our suppliers will hold their own suppliers to the same high standards. Suppliers are also obligated to comply with [Sprinklr's Supplier Code of Conduct](#) or an internal code of conduct that is substantially aligned in all material respects with Sprinklr's Supplier Code of Conduct.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, trustees, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, suppliers and business partners, all of whom have a duty to comply with this and other policies designed to prevent modern slavery.

## Sprinklr's Organizational Structure and Business

Sprinklr is the most complete social media management system for the enterprise. We help the world's largest brands with marketing, advertising, care, sales, research, and commerce on 30+ digital channels – all on one integrated platform.

Sprinklr, Inc. is the ultimate parent company of Sprinklr and is headquartered in New York, New York, USA. Sprinklr's stock is listed on the New York Stock Exchange under the symbol "CXM" and we operate and have subsidiaries all over the world.

Sprinklr recognizes the important role we play in protecting the rights of people, and we are committed to doing the right always – not only for our customers and employees, but also for other stakeholders, partners, and the communities with whom we interact.

## Our Employees

We are committed to maintaining a fair and ethical workplace for all our employees that is free of bullying, harassment, discrimination, and violence. Sprinklr also prohibits the use of all forms of forced labor and any form of human trafficking.

Under our [Code of Conduct and Ethics](#), Sprinklr employees must:

- Follow the law;
- Treat everyone honestly and courteously at all times;
- Approach all situations from a place of respect and sensitivity, even when others may have different backgrounds, experiences, or ideas; and



- Make a report if there is a suspected violation of human rights, including any act of retaliation that may be witnessed as the result of colleagues standing up for their rights or the rights of others.

We also strive to ensure compliance with all applicable laws relating to employee recruitment and terms and conditions, including obtaining right to work evidence and ensuring that no staff in our global offices are paid less than the applicable national minimum or living wage.

Any employee who violates the requirements or principles in this Statement will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organizations working on our behalf if they breach this Statement. Breach of this Statement may lead to prosecution under Modern Slavery Laws.

## Our Governance and Training

We have implemented policies as part of our commitment to ethical business practices and the abolition of all forms of slavery and human trafficking to help ensure that our business practices are fair, ethical, honest, and in compliance with all applicable laws and regulations. The following governance reflects the importance Sprinklr places in operating in an ethical and compliant manner, as well as our commitment to maintaining a diverse and safe workplace:

- Code of Conduct and Ethics
- Corporate Disclosure Policy
- Insider Trading Policy
- Anti-Corruption Policy
- Whistleblower Policy
- Global Harassment & Discrimination Policy
- Health, Safety, and Sustainability Policy
- Employee Privacy Notice
- Procurement Process

Sprinklr also provides transparency over its efforts on Environmental, Social, and Governance (ESG) initiatives, which is available [here](#).

Sprinklr provides training on all governance upon hire and annually thereafter to help ensure a unified approach in the application of Sprinklr's governance and the expectations of employees contained therein. Sprinklr's governance is monitored and reviewed at least annually to help ensure ongoing effectiveness.

Sprinklr's encourages all employees to make good faith reports of any issues of illegal or unethical conduct. If employees become aware of any issues which violate this Statement or Sprinklr governance, Sprinklr's Whistleblower Policy gives employees avenues through which such issues can be raised without fear of retaliation, including through anonymous avenues such as Sprinklr's Compliance and Ethics hotline. Sprinklr's Compliance and Ethics hotline is hosted through an independent third party and enables anonymous reporting and two-way communications between Sprinklr and the reporter. Sprinklr promptly and thoroughly



investigates all concerns, including through external resources, as needed based on the nature of the reported issue. Reports can be made by either calling the toll-free hotline or by submitting an anonymous report. More information can be found [here](#).

## Sprinklr's Certifications

Sprinklr is annually certified by EcoVadis, whose CSR analysis system covers twenty-one (21) criteria across the four (4) themes of Fair Labor & Human Rights, Ethics, Environment, and Sustainable Procurement. The EcoVadis assessment methodology is built on international CSR standards, including the Global Reporting Initiative and the United Nations Global Compact (UNGC). Further details of the EcoVadis certification can be found at <https://ecovadis.com/>.

In addition to the integration of UNGC principles within EcoVadis, Sprinklr has also been an express signatory to the UNGC since 2019. The UNGC is a voluntary initiative based on company commitments to implement and annually report on efforts related to human rights, labor, anti-corruption, and environmental sustainability. The UNGC is comprised of Ten Principles, which are derived from the [Universal Declaration of Human Rights](#), the [International Labour Organization's Declaration on Fundamental Principles and Rights at Work](#), the [Rio Declaration on Environment and Development](#), and the [United Nations Convention Against Corruption](#). The Ten Principles include a commitment to supporting and respecting the protection of internationally proclaimed human rights, ensuring businesses are not complicit in human rights abuses, upholding the freedom of association and collective bargaining, eliminating all forms of forced and compulsory labor, abolishing child labor, and eliminating discrimination with respect to one's employment and occupation. Further details on Sprinklr's participation in the UNGC can be found [here](#).

## Our Supply Chain and Vendors

As a social media management and customer support cloud-based SaaS platform, Sprinklr does not have an active supply chain of consequence. Sprinklr does not handle raw materials, operate factories, or engage in the manufacture of goods. As a result, Sprinklr's key suppliers are primarily focused on software, data and cloud storage, office facilities and supplies, professional services, and marketing technology. As a result, the risk of modern slavery within Sprinklr's supply chain is low.

Despite this low risk, Sprinklr remains vigilant, and we do not tolerate slavery, human trafficking, or other human rights abuses within our supply chain. We expect all entities within our supply chain to uphold the same high standards Sprinklr has set internally, including striving to ensure that all employees are treated with dignity and respect in a fair and ethical environment. Sprinklr's relationships with third parties are governed by written contracts, and any new suppliers undergo due diligence through Sprinklr's robust and cross functional Procurement Process. Suppliers are also obligated to comply with [Sprinklr's Supplier Code of Conduct](#) or an internal code of conduct that is substantially aligned in all material respects with Sprinklr's Supplier Code of Conduct.



Sprinklr endeavors to review potential areas of risk in relation to our business, and supplier relationships are subject to ongoing review. Sprinklr will continue to manage any identified risks by building on the principles included within Sprinklr’s governance, and Sprinklr will not knowingly work with a supplier involved in (or suspected to be involved in) modern slavery or human trafficking.

## Looking Ahead

We will continue to monitor and develop our practices in respect of combatting slavery or human trafficking. Sprinklr checks and tests the success of our commitments and works to ensure that we meet our expectations.

## Approval and Revision History

Date	Approved By
August 20, 2019	Legal
September 14, 2022	Board of Directors
August 31, 2023	Board of Directors
August 21, 2024	Board of Directors